

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ESTÉE LAUDER COSMETICS LTD. and
MAKE-UP ART COSMETICS INC.,

Plaintiffs,

v.

[REDACTED] and [REDACTED],

Defendants.

Case No. 20-cv-00820

Judge Edmond E. Chang

Magistrate Judge Gabriel A. Fuentes

**MEMORANDUM IN SUPPORT OF PLAINTIFFS' *EX PARTE*
MOTION TO EXTEND THE TEMPORARY RESTRAINING ORDER**

Pursuant to Rule 65(b)(2) of the Federal Rules of Civil Procedure and the Court's inherent power to effectuate its own orders, Plaintiffs Estée Lauder Cosmetics Ltd. and Make-Up Art Cosmetics Inc. (together, "Plaintiffs") seek to extend the Temporary Restraining Order granted and entered by the Court on February 13, 2020 (the "TRO") [29] by a period of fourteen (14) days until March 12, 2020.

On February 13, 2020, this Court entered the TRO against the Defendants identified on Schedule A to the Amended Complaint. [29]. As of February 18, 2020, the third parties have not completed effectuating the TRO. Declaration of Justin R. Gaudio at ¶ 2. Plaintiffs plan to freeze financial accounts identified by the third parties. *Id.*

Rule 65(b)(2) states that a temporary restraining order entered without notice may be extended provided a party can show, prior to expiration of the order, good cause for such an extension. Fed. R. Civ. P. 65(b)(2). Plaintiffs respectfully submit that there is good cause to extend the TRO, since there is a high probability that the Defendants will continue to harm Plaintiffs without the TRO in place. Specifically, Defendants will likely attempt to move any

assets from their financial accounts to off-shore bank accounts. As discussed in Plaintiffs' Memorandum in Support of their *Ex Parte* Motion for Entry of a Temporary Restraining Order, and as found by the Court in granting the TRO, this possibility of harm is significant. Accordingly, in the interest of justice, Plaintiffs submit that extension of the TRO is necessary. In light of the above, Plaintiffs respectfully request that the TRO be extended for a period of fourteen (14) days until March 12, 2020.

Dated this 18th day of February 2020. Respectfully submitted,

/s/ Justin R. Gaudio

Amy C. Ziegler
Justin R. Gaudio
Allyson M. Martin
Greer, Burns & Crain, Ltd.
300 South Wacker Drive, Suite 2500
Chicago, Illinois 60606
312.360.0080 / 312.360.9315 (facsimile)
aziegler@gbc.law
jgaudio@gbc.law
amartin@gbc.law

*Counsel for Plaintiffs Estée Lauder Cosmetics Ltd.
and Make-Up Art Cosmetics Inc.*